

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
	)	
Broadcast Localism	)	MB Docket No. 04-
233	)	

**COMMENTS OF EDUCATIONAL STATION WJCU**

1. The volunteers and staff of Radio station WJCU respectfully submit these comments in the above-captioned proceeding.
2. The majority of the proposals supposedly advanced to increase “localism” as outlined in the “REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING” (“NPRM”) contain extensive recordkeeping and paperwork requirements that are a particular burden to noncommercial broadcasters, like our station which is predominantly staffed by students and community volunteers. Our station is of limited financial means, and, with the exception of a faculty member who serves as General Manager/Chief Operator, relies exclusively on volunteer labor to operate. To force stations like ours to comply with the extensive requirements set out in the NPRM may well be forcing these stations to do the impossible, as we simply have no means of complying with extensive paperwork requirements. If we are forced to comply, our station may not be able to operate, or may not be

able to carry programming addressing community issues for which extensive documentation is required, thereby defeating the entire purpose of the FCC's proceeding.

3. Thus, it is our opinion that, even if consideration of the majority of the proposal rules is not dropped for all radio stations, we respectfully request that Educational Stations (defined as FCC-licensed radio station, directly operated by, or affiliated with and officially sanctioned by a domestically accredited primary or secondary school, college, university or other post-secondary degree granting educational institution that is not a "public broadcasting entity" under 17 USC 118(g) ("Educational Station") with less than 5 Full Time Employees] be exempt from these proposed rules because they present unduly burdensome new requirements on small, educational licensed facilities with extremely limited resources such as our station.
4. Our station already serves the public by providing unique programming to our community, and information to the students of the institution with which we are affiliated. For example, each week WJCU airs over an hour of international news, 3 hours of public service programming, and hosts (at no charge) 14 hours of community-based local programming that serves unique ethnic and minority groups in our surrounding community. WJCU also hosts annual fund drives for a local hunger network and routinely promotes other community non-profit organizations on a purely voluntary basis.

5. Specifically, the following proposals would reduce our ability to produce programming of the sort envisioned by the NPRM due the amount of resources that would need to be dedicated to producing the documents and reports proposed as this work would be done by the same students and community volunteers that produce the programming who have limited time to commit to support our educational station.
- Enhanced Disclosure forms
  - Placing our Public File on a web site
  - Posting Renewal Application Pre- and Post-Filing Announcements on a web site
  - Formation of and meetings with a Community Advisory Board
  - Reporting Music Data and selection criteria
6. We also are particularly concerned about the proposal to require our station to maintain a physical presence during all hours of operation, which we consider to be exceptionally contrary to the goals to “promote both localism and diversity”. We rely on automation systems to air various types of “diverse” programming, including those the Commission might consider “local” (even though we fail to find a definition of this term in the NPRM) via our automation system. We simply lack the volunteers and fiscal resources to staff our studios during all hours of operations. Simply

put, this requirement would require our station to go off-air when we could not have someone present in the studios, thus robbing the community we serve of “local” and “diverse” programming.

7. Further, if these rules were adopted, we might not be able to maintain minimum operating hours as per 73.561(b) which could subject the station to a time share proposal, which could otherwise be avoided or even worse, we might not be able to meet the requirements of 73.561(a) during periods of staff transitions when returning from “those days designated on the official school calendar as vacation or recess periods.”
8. We understand that College Broadcasters, Inc (“CBI”) will be submitting comments in this proceeding. We support those comments and incorporate them herein, by reference.

Respectfully submitted,

Mark Krieger

General Manager

WJCU Radio  
John Carroll University

Date: April 22, 2008